

## REMARKS

Claims remaining in the present application are Claims 1-35.

## DRAWINGS

The drawings are objected to under 37 CFR 1.83(a) for failing to show all claimed features. Applicants respectfully assert that the drawings show every feature of the claimed invention.

Numerous Figures depict a graphical user interface allowing user input with respect to configuring a circuit comprising a plurality of modules. Applicants respectfully assert that it is understood that a graphical user interface receives inputs.

Figure 1A is a diagram illustrating a graphical user interface allowing a user to select a user module and display its schematic and its data sheet, according to an embodiment of the present invention. Figure 1B is a diagram illustrating a graphical user interface allowing a user to place a user module in a graphical user interface, according to an embodiment of the present invention. Figure 1C is a diagram illustrating a graphical user interface allowing a user to configure pins, according to an embodiment of the present invention.

Figure 4 is a diagram illustrating a graphical user interface allowing selection of user module parameters, according to an embodiment of the present invention. Figure 5A, Figure 5B, and Figure 5C are diagrams illustrating graphical user interfaces for facilitating configuring I/O pins, according to an embodiment of the present invention. Figure 6A, Figure 6B, Figure 6C, and Figure 6D are illustrations of graphical user interfaces for configuring interconnections between programmable blocks, according to an embodiment of the present invention.

Figure 2, which is a flowchart illustrating steps of a process of facilitating programming a microcontroller, according to an embodiment of the present invention, shows steps related to receiving inputs to configure a circuit at least in step 220 (selected user module), 230 (request for a position), 250 (request for new position), 260 (interface allows parameter selection), 280 (window allows configuration of interconnections).

Figure 2 also shows, in step 290, automatic generation of APIs, source code, data sheet and interrupts.

Therefore, Applicants respectfully assert that the drawings comply with CFR 1.83(a).

CLAIM REJECTIONS

35 U.S.C. § 102

Cypress IDE

Claims 1-5, 11-16, 19, 21-25 and 30-35 are rejected under 35 U.S.C. 102(a) as being anticipated by Cypress Microsystems, “PsoC Designer: Integrated Development Environment, Getting Started: 25 Minute Tutorial,” Version 1.0. (hereinafter, Cypress IDE).

Applicants have attached to this response declarations under 37 C.F.R. § 1.132 traversing the grounds of rejection under 35 U.S.C. § 102(a). The attached declarations indicate that to the extent that subject matter is included in Cypress IDE that may be claimed in Claims 1-5, 11-16, 19, 21-25 and 30-35, such subject matter is understood to be derived from the Applicants' own work. As such, the reference “Cypress IDE” may not be used in a 35 U.S.C. 102(a) rejection to Claims 1-5, 11-16, 19, 21-25 and 30-35. No admission has been made that Cypress IDE contains subject matter that anticipates or renders obvious any Claims of the present application.

Therefore, the rejection under 35 U.S.C. 102(a) based on Cypress IDE is groundless, and the Applicants respectfully assert that the rejection has been overcome.

In light of the attached declarations under 37 C.F.R. §1.132, Applicants respectfully assert that the subject matter claimed in Claims 1-5, 11-16, 19, 21-25 and 30-35 is not anticipated by Cypress IDE and earnestly solicit the allowance of Claims 1-5, 11-16, 19, 21-25 and 30-35.

PSoC™ Technology

Claims 1, 10, 13, 20, 22 and 29 are rejected under 35 U.S.C. 102(a) as being anticipated by “PSoC™ Technology Completely Changes 8-Bit MCU System Design!” (hereinafter, PSoC™ Technology).

Applicants have attached to this response declarations under 37 C.F.R. §1.132 traversing the grounds of rejection under 35 U.S.C. §102(a). The attached declarations indicate that to the extent that subject matter is included in PSoC™ Technology that may be claimed in Claims 1, 10, 13, 20, 22 and 29, such subject matter is understood to be derived from the Applicants' own work. As such, the reference “PSoC™ Technology” may not be used in a 35 U.S.C. 102(a) rejection to Claims 1, 10, 13, 20, 22 and 29. No admission has been made that PSoC™ Technology contains subject matter that anticipates or renders obvious any claims of the present application.

Therefore, the rejection under 35 U.S.C. 102(a) based on PSoC™ Technology is groundless, and the Applicants respectfully assert that the rejection has been overcome.

In light of the attached declarations under 37 C.F.R. § 1.132,  
Applicants respectfully assert that the subject matter claimed in Claims 1,  
10, 13, 20, 22 and 29 is not anticipated by PSoC™ Technology and earnestly  
solicit the allowance of Claims 1, 10, 13, 20, 22 and 29.

Publication Date of PSoC™ Technology

Applicants respectfully traverse the alleged publication date of the PSoC™ Technology reference. Section "V" of the Notice of References cited in the Office Action appears to allege a publication date of February 19, 2001 for pages 1-21 of the PSoC™ Technology reference. This date appears to be based on the information in the footer of page 1 of the PSoC™ Technology reference. However, information in the footer of other pages of the PSoC™ Technology reference suggests later publication dates for most pages of the reference.

In particular, the information in the footer on pages 13-19 of PSoC™ Technology suggests that those pages may have been published in 2004. Therefore, Applicants respectfully assert that the reference fails to present a *prima facie* case that pages 13-19 of PSoC™ Technology were published prior to the filing date of the present application. Therefore, Applicants respectfully assert that pages 13-19 of PSoC™ Technology do not qualify as prior art under 35 U.S.C. § 102(a).

Furthermore, the information in the footer on pages 2-7, 9-12 and 21-21 of PSoC™ Technology suggests that those pages were published later than February 19, 2001. Therefore, Applicants respectfully assert that the reference fails to present a prima facie case that pages 2-7, 9-12 and 20-21 of PSoC™ Technology were published on February 19, 2001.

Elayda

To the extent that any claims of the present application are rejected as being anticipated or rendered obvious by Elayda, US Patent 6,438,738 (hereinafter, Elayda), Applicants respectfully traverse the rejection on the grounds that the rejection fails to present a prima facie case of anticipation. The rejection cites Elayda on page 3 (under the heading for the 35 U.S.C. §102 rejection), but does not point out any teaching in Elayda that allegedly anticipates or renders obvious the claimed invention. Applicants understand the citation to Elayda in the 35 USC §102 rejection to be a typographical error and request confirmation thereof.

35 U.S.C. 103(a)

Claims 6-9, 17-18 and 26-28 are rejected under 35 U.S.C. 103(a) as being unpatentable over “PSoC™ Technology Completely Changes 8-Bit MCU System Design!” (hereinafter, PSoC™ Technology) in view of Weiss et al. U.S. Patent No. 6,711,731 (hereinafter, Weiss).

For reasons discussed herein, "PSoC™ Technology" is respectfully believed to be disqualified as prior art under 35 U.S.C. §102(a). Applicants respectfully assert that PSoC™ Technology does not qualify as prior art under any paragraph of 35 U.S.C. §102, and therefore may not be used in a rejection under 35 U.S.C. §103(a).

Applicants respectfully assert that Weiss fails to teach or suggest the limitations of any of the Independent Claims (1, 13, 22). Therefore, all Claims in the present application are respectfully believed to be allowable over Weiss.

For the foregoing reasons, Claims 6-9, 17-18 and 26-28 are respectfully believed to be allowable.

CONCLUSION

Should the Examiner have a question regarding the instant response, the Applicants invite the Examiner to contact the Applicants' undersigned representative at the below listed telephone number.

Based on the arguments and amendments presented above, it is respectfully submitted that Claims 1-35 overcome the rejections and objections of record and, therefore, allowance of Claims 1-35 is earnestly solicited.

Respectfully submitted,  
WAGNER, MURABITO & HAO LLP

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